

Dear FCC:

CG Docket 03-123

It is my understanding that the Federal Communications Commission is considering a change to Video Relay Service that would greatly discourage the investments that have improved VRS service, and delay even further the "functional equivalence" mandated by the Americans with Disabilities Act.

VRS is a life altering technology for a deaf person. It allows communication in American Sign Language, the native language of a deaf person, over distance, something that no other technology allows. The passage of the provision in the Americans with Disabilities Act requiring functional equivalence was a landmark for improving the lives of deaf people. While VRS holds the promise of true functional equivalence, there is still much to be done to reach that goal, to improve VRS service and make it available to more deaf people.

The FCC provided a stable, predictable, and fair rate plan to VRS providers in 2007 that was to last for three years. At the time, the FCC stated clearly that one of the motivations behind the three year rate plan was to encourage providers to invest in better VRS service, better technology, and better interpreters. It is apparent to VRS users that VRS service is improving. Wait times for calls are shorter, videophones are substantially improved, 911 emergency service is now provided, individual telephone numbers are now available, and we understand that research is underway on technology that will improve VRS even more.

It is unthinkable to me that the FCC would intentionally hurt deaf people by undercutting VRS. Instead the FCC should be demanding more improvements in VRS. At a time when President Obama is insisting on the availability of broadband, particularly for vulnerable populations like the deaf, it is astonishing that the FCC would be heading in the opposite direction, cutting back on a broadband service like VRS that is absolutely essential to the deaf.

The FCC committed to a three year rate plan to improve VRS service, and it has worked. How can the FCC now suggest that it is going to renege on that commitment?

I urge you as strongly as I can not to shut down the investment and improvements in VRS, and instead to make better VRS available to more deaf people.

Sincerely,

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